

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JAY SRINIVASAN,  
Plaintiff,

v.

Civil Action No. 1:05-CV-10900-GAO

SIEMENS BUSINESS SERVICES, INC.,  
Defendant.

**JOINT PROPOSED PRETRIAL SCHEDULE**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(d), the parties to the above-captioned action hereby submit the following joint proposed pretrial schedule:

**I. Joint Discovery Plan**

A. The parties suggest five months for completion of all fact discovery, ending March 24, 2006, which discovery is not anticipated to exceed:

1. Ten deposition days upon oral examination by each party, pursuant to Fed R. Civ. P. 30, not exceeding ten hours each and no party or witness is anticipated to be deposed more than once;
2. Twenty-five interrogatories, pursuant to Fed. R. Civ. P. 33, including all discrete subparts; and
3. Twenty-five requests for production of documents and things, pursuant to Fed. R. Civ. P. 34, including all discrete subparts.

B. The parties suggest three months to disclose experts and to complete all expert discovery following the Court's decision on the summary judgment motions, provided Plaintiff's claims are not dismissed.

- C. The parties request that discovery be conducted in two phases. During first phase the parties will complete all fact discovery. During the second phase the parties will complete all expert discovery. The second phase will take place following the Court's decision on the summary judgment motions only if Plaintiff's claims are not dismissed in their entirety.
- D. The parties suggest a settlement conference with their respective clients in attendance after fact discovery is completed or sooner if the parties jointly agree that discovery has progressed to the point that such a settlement conference may be had at such time.
- E. The parties suggest a case management conference at the end of five months and a final pre-trial conference at the end of twelve months.

## **II. Proposed Schedule for Filing of Motions**

The parties suggest the following schedule for filing motions:

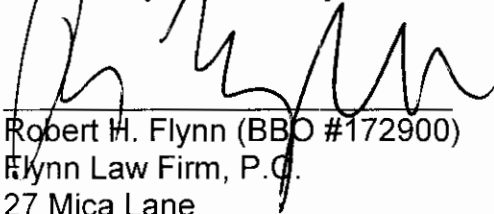
- A. All motions made pursuant to Fed. R. Civ. P. 12, 15, 19 and 20 shall be filed by January 2, 2006;
- B. All discovery motions shall be made within the discovery period; and
- C. All motions made pursuant to Fed. R. Civ. P. 56 shall be filed by May 26, 2006.

## **III. Certifications**

Certifications signed by counsel for both parties and by Plaintiff and an authorized representative of Defendant, respectively, affirming that each party and party's counsel have conferred with a view to establishing a budget for the costs of conducting the full course, and alternatives to, the litigation and to

consider the resolution of the litigation through the use of alternative dispute resolution programs are attached hereto.

Respectfully submitted,  
Jay Srinivasan,  
Plaintiff, by his Attorney,



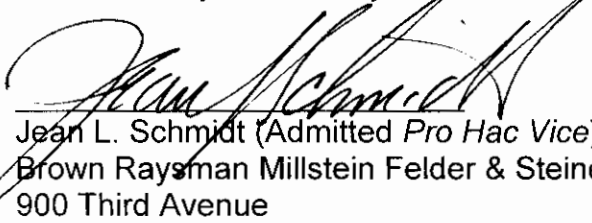
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Respectfully submitted,  
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Defendant, by its Attorney,



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Respectfully submitted,  
Siemens Business Services, Inc.,  
Defendant, by its Attorney,



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Dated: October 17, 2005